

VLADECK, WALDMAN, ELIAS & ENGELHARD, P.C.

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED 5/1/08	COUNSELORS AT LAW 1501 BROADWAY NEW YORK, N.Y. 10036 TEL 212/403-7300 FAX 212/221-3172
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April 16, 2008

By Hand

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street - Room 1050
New York, New York 10007

Re: Amy Levenson v. Barclays PLC, et al.;
07 CV 6656 (AKH) (AJP)

Dear Judge Hellerstein:

Pursuant to Rule 2.E of Your Honor's Individual Rules, the parties submit this letter concerning discovery. Pursuant to Fed. R. Civ. P. 37(a)(2)(A), Rick Fessel and Gerald Kuppusamy for defendants and Anne Vladeck and Maia Goodell for plaintiff met and conferred by telephone on March 4 and March 5 for a total of approximately three hours, with follow-up telephone calls and correspondence.

Plaintiff's Position

We represent plaintiff Amy Levenson ("Levenson" or "plaintiff") in this action against defendants Barclays Plc, Barclays Bank Plc, and Barclays Capital Inc. ("Barclays Capital") (collectively "Barclays," "Bank," or "defendants"). We write to ask the Court: (1) to compel discovery with respect to various of plaintiff's written discovery requests, pursuant to Fed. R. Civ. P. 26(b)(1); (2) for a deadline for defendants to produce outstanding written discovery promptly by a date the Court deems reasonable, pursuant to Fed. R. Civ. P. 26(c)(1)(B).

Defendants' Position

For the reasons described below, Barclays does not believe that any additional production is warranted. If, however, the Court disagrees, Barclays obviously agrees with

*Motions
Decided as per rulings
on record May 1,
2008. So ordered.
5/1/08
Alvin Hellerstein*